

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA)	
)	Criminal File No.
V.)	
)	15 CR 082 TCB LTW
ANGELA WILLIAMS)	
_____)	

DEFENDANT ANGELA WILLIAMS' MOTION TO SUPPRESS
STATEMENTS

Angela Williams, by counsel, moves the Court to suppress statements made by Ms. Williams on or about December 20, 2013 and January 8, 2015. The statements were given following a wrongful seizure of materials from Ms. Williams, which is the subject of her motion to suppress contents of car and phone, filed contemporaneously herewith. In this motion, Ms. Williams seeks suppression of statements made by her at the prompting of the Postal Inspection Service.

Ms. Williams was arrested following a search of her car and seizure of her cell phone, on November 15, 2013. She contends this search and seizure was wrongful, such that the evidence should be suppressed. The statements she provided were obtained solely because of the existence of that wrongfully-obtained evidence.

On the same day as her arrest, Ms. Williams was asked questions by the Postal Inspector. She declined. Thereupon, bond was set for her on Mississippi charges, in the amount

\$250,000, a sum she had no hope of obtaining. Ms. Williams had no criminal history whatsoever before this event. She has four young children in Georgia. Ms. Williams remained in jail for 38 days. She understood that she would not get a lesser bond unless she cooperated with law enforcement authorities, including giving a statement. She was interviewed on or about December 20, 2013. She was given no *Miranda* warning. She gave a statement. Four days later, her bond was reduced to \$50,000, and she was released. She remained on bond thereafter for a little more than a year, before being sentenced in Mississippi for the same conduct which is the subject matter of this indictment.

Ms. Williams' statement must be suppressed as fruit of the poisonous tree. See, e.g., United States v. Virden, 488 F.3d 1317 (11th Cir. 2007); United States v. Chanthaasouxat, 342 F.3d 1271 (11th Cir. 2003); United States v. Davis, 313 F.3d 1300 (11th Cir. 2002).

Ms. Williams requests (a) an evidentiary hearing; and (b) leave to supplement this brief following such hearing.

Submitted this 28th day of September, 2015.

/s/ Albert Norton, Jr.
Albert Norton, Jr.
Georgia Bar No. 546760

Norton & Associates, PC
Suite 6304
1000 Peachtree Ind. Blvd.
Suwanee, GA 30024
770 623 3332
anorton@nortonlegal.com

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CERTIFICATE OF SERVICE

I certify that I served the foregoing motion for
continuance by ecf on the 28th day of September, 2015.

/s/ Albert Norton, Jr.
Albert Norton, Jr.
Georgia Bar No. 546760

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